

1 Q Were you familiar with an account, the DLB account
2 and the Brasher account?

3 A The Brasher account was not a corporate account.
4 That was a personal account for Pat and Ron.

5 Q Okay.

6 A It was not a corporate account.

7 Q Okay. Did you have an involvement in setting up
8 that account as well?

9 A No, sir, I didn't have an involvement in setting
10 it up.

11 Q Okay.

12 A But I --

13 Q Did you know what it was used for?

14 A Yes, I did.

15 Q Okay. Could you explain what it was used for?

16 A Well, it was a personal account that we reported
17 on their personal income tax return on Schedule C and
18 Schedule E for the rental of repeaters, and they owned many
19 of these repeaters personally. And we would take revenue
20 from DLB for rental of the repeaters, and they would report
21 that.

22 And the Brasher account was simply an account that
23 the expenses were paid out of and the money was deposited
24 into from this repeater rental.

25 Q Okay. So the Brasher account paid the site

1 rental; is that correct, for the repeaters? Is that what
2 I --

3 JUDGE STEINBERG: Number one, that's leading;
4 number two, that's not what the witness said.

5 MR. KNOWLES-KELLETT: Okay.

6 JUDGE STEINBERG: What the witness referred is not
7 site rental. He referred to rental for repeaters. So you
8 might want to ask --

9 BY MR. KNOWLES-KELLETT:

10 Q Okay, there were too many rentals in there is my
11 problem and I'm trying to break down the answer.

12 Do you understand -- could you explain -- what did
13 DLB pay the Brashers for?

14 A They paid them a rental charge for the use of the
15 repeaters.

16 Q Okay. And then what did the Brashers pay out of
17 that Brasher account?

18 A I'm not sure if I remember exactly what they paid
19 out of it.

20 Q Okay, what do you remember them paying out?

21 A I just don't have a recall for what was paid out
22 of the account. I'm sorry.

23 Q Okie-doke.

24 I would like you to turn to Exhibit 34. It's in
25 the book with all the tabs.

1 (Pause.)

2 BY MR. KNOWLES-KELLETT:

3 Q Do you recognize this document?

4 A Yes, sir.

5 Q Okay. In the days that you have spent waiting to
6 testify, have you had a chance to review this document?

7 A Yes, sir, I have.

8 Q Okay. On page 18 of this document, is that your
9 signature?

10 A Yes, sir, it is.

11 MR. ROMNEY: Excuse me. What exhibit number
12 again?

13 MR. KNOWLES-KELLETT: Thirty-four.

14 MR. ROMNEY: Thirty-four. Thank you.

15 BY MR. KNOWLES-KELLETT:

16 Q In reviewing this document, are there any facts in
17 this document that you think are incorrect as you sit here?

18 A No, sir.

19 Q Okay. So you didn't recall things differently?

20 A No, sir.

21 Q Okie-doke. Okay, please turn to 37. Do you
22 recognize this document?

23 A Yes, sir, I do.

24 MR. ROMNEY: Exhibit 37 or page 37?

25 JUDGE STEINBERG: Exhibit 37. That's my

1 understanding.

2 MR. KNOWLES-KELLETT: Pardon?

3 JUDGE STEINBERG: Exhibit 37?

4 MR. KNOWLES-KELLETT: Exhibit 37.

5 JUDGE STEINBERG: Thank you.

6 BY MR. KNOWLES-KELLETT:

7 Q With respect to 34, are the statements in there
8 true and accurate to the best of your --

9 JUDGE STEINBERG: Wait.

10 BY MR. KNOWLES-KELLETT:

11 Q -- ability?

12 MR. ROMNEY: Thirty-seven or 34?

13 MR. KNOWLES-KELLETT: I'm sorry. I'm going back
14 just to nail the coffin shut on 34.

15 JUDGE STEINBERG: Okay. Everybody back to 34.

16 BY MR. KNOWLES-KELLETT:

17 Q I'm not sure you -- okay, back to 34, your joint
18 statement that you reviewed during this past week.

19 Are the statements in there true and accurate, to
20 the best of your knowledge?

21 A Yes, sir.

22 Q Now, now to 37.

23 A Okay.

24 JUDGE STEINBERG: Exhibit 37.

25 MR. KNOWLES-KELLETT: Right.

1 BY MR. KNOWLES-KELLETT:

2 Q Do you recognize this document?

3 A Yes, sir, I do.

4 Q Okay. On page 8, is that your signature?

5 A Yes, sir, it is.

6 MR. ROMNEY: What page?

7 MR. KNOWLES-KELLETT: Page 8.

8 MS. LANCASTER: Page 8.

9 BY MR. KNOWLES-KELLETT:

10 Q Have you had a chance to review this document?

11 A Yes, sir.

12 Q Okay. Are the statements in there true and
13 accurate, to the best of your knowledge?

14 A Yes, sir.

15 MR. ROMNEY: Your Honor, may I request permission
16 to voir dire the witness on this exhibit?

17 JUDGE STEINBERG: Certainly. Wait a minute. The
18 exhibit has been received so there is nothing to voir dire
19 on so you have to cross-examine him.

20 MR. ROMNEY: Fine. Either way.

21 JUDGE STEINBERG: It's no big deal but you have to
22 do it later. You're trying to fool me, I think.

23 Let the record reflect that Mr. Romney chuckled.

24 BY MR. KNOWLES-KELLETT:

25 Q Okay, I would like you to turn back now to Exhibit

1 35, which is a --

2 (Pause.)

3 BY MR. KNOWLES-KELLETT:

4 Q This is an application -- do you recognize this to
5 be an application for a radio license?

6 JUDGE STEINBERG: Well, let's direct the witness
7 to the page 3 and the following pages.

8 BY MR. KNOWLES-KELLETT:

9 Q Okay, page 3 and the following pages.

10 A Okay.

11 Q Do you recognize that as an application for mobile
12 radio service authorization?

13 A I do after this has all started, yes sir.

14 Q Okay.

15 JUDGE STEINBERG: When you say "after this has all
16 started," what do you mean?

17 THE WITNESS: I wouldn't have before, Your Honor.

18 JUDGE STEINBERG: Okay. And when you say "after
19 all this has started," what precisely do you --

20 THE WITNESS: November of '97.

21 JUDGE STEINBERG: What happened then?

22 THE WITNESS: We received that -- I'm sorry. I'm
23 sorry. I received the petition to show cause from Net Wave.

24 JUDGE STEINBERG: Okay, but before you received
25 that and before all this, in your phraseology started, you

1 would not have know what Exhibit 35, page 3 was?

2 THE WITNESS: No, sir, I would not.

3 BY MR. KNOWLES-KELLETT:

4 Q Okay, page 4, is that your signature?

5 A No, sir.

6 Q Is that your handwriting?

7 A No, sir, not at all.

8 Q Okay. Did you place the date there?

9 A No, sir.

10 Q Okay.

11 (Pause.)

12 BY MR. KNOWLES-KELLETT:

13 Q Do you recognize the handwriting as anyone you
14 know?

15 A No, sir, I don't.

16 Q When is the first time you saw this application?

17 A The first time I saw this application was when Mr.
18 McVeigh obtained the copy of it in the spring of 1999.

19 Q Did you ever see a copy of this in your office in
20 the vicinity of June '96?

21 A No, sir.

22 JUDGE STEINBERG: With or without the signature.

23 //

24 BY MR. KNOWLES-KELLETT:

25 Q With or without the signature?

1 A No, sir.

2 Q Did anybody from DLB discuss the use of your name,
3 using your name on this application to obtain a frequency
4 for DLB?

5 A No, sir.

6 Q Did anybody from DLB discuss the use of your name
7 on any radio application?

8 A Earlier there was talk between Ronald and I.
9 Ronald asked me earlier in the late eighties, early
10 nineties, to use my name on a radio application.

11 Q And what happened?

12 A And I said no, that the way he explained it was
13 that he would use my name, put it in this drawing type
14 thing. And as soon as -- if I was granted a license, then
15 he would immediately transfer it. And I told him that I
16 didn't want to do that because I was his accountant and I
17 wanted to keep some semblance of independence in our
18 engagement, and that I didn't want him to use my name that-
19 away, and had that discussion.

20 Q Okay. Was there any discussion at that time about
21 Norma, Jennifer and Melissa making application?

22 A Yes, there was.

23 Q And did they make such application?

24 A Yes, sir.

25 Q And did you have any problem with that?

1 A I didn't the way he explained it, that it would
2 immediately transferred, and that there was nothing wrong or
3 there was nothing illegal about doing this. It just simply
4 gave him a better chance to obtain the license.

5 Q Okay. Did you agree to invest -- ever agree to
6 invest in any enterprise involving a radio station license?

7 A Absolutely not.

8 Q Okay. At the time of this application, June '96,
9 were you aware of any need of DLB -- business need of DLB
10 for these frequencies in Allen, Texas?

11 A I had no way to know what frequencies they needed
12 or how many license they needed from the work I did for
13 them.

14 Q Okay. Did they talk to you at all about a future
15 business plan or anything that would indicate when they
16 would need new licenses?

17 A The only -- there was a general understanding that
18 Ronald want it to grow as fast as he could. But as far as
19 knowing about freq -- I still to this day don't understand
20 what goes on a radio license, a frequency and all that. So
21 he talked in general terms, you know, about radio license
22 and he was growing, and I knew that much, but that was all.

23 Q Turning to page 3 of the application, of the
24 exhibit, first page of the application.

25 MR. ROMNEY: Which exhibit are we on?

1 MR. KNOWLES-KELLETT: Exhibit 35.

2 JUDGE STEINBERG: Thirty-five.

3 BY MR. KNOWLES-KELLETT:

4 Q Is that your correct mailing address listed in
5 five and six? Was that at one time your correct mailing
6 address?

7 MR. MCVEIGH: Are you talking about items five and
8 six?

9 THE WITNESS: And it is. I was thinking of the
10 suite, but I believe the suite is correct also currently.
11 We've moved in that building three times since I've been in
12 the building in the last 15 years, and I believe 140 was the
13 suite at that time. It's not today.

14 BY MR. KNOWLES-KELLETT:

15 Q Okay, I would like to turn your attention Exhibit
16 37, page 33.

17 A Thirty-three.

18 Q Yes.

19 A Okay.

20 Q Have you seen that document?

21 A Yes, sir, I've seen it.

22 Q When is the first time you saw it?

23 A I think when Mr. McVeigh obtained it, and that was
24 in the spring of '99.

25 Q Okay. Did you ever see it -- was it ever mailed

1 to your office?

2 A No, sir.

3 Q Okay.

4 JUDGE STEINBERG: Well, if it was mailed, you
5 never received it.

6 THE WITNESS: I didn't receive it.

7 MR. KNOWLES-KELLETT: Okay.

8 BY MR. KNOWLES-KELLETT:

9 Q Who gets the mail at your office?

10 A Normally I get the mail. Now that probably has
11 changed currently. Now I have a partner. He gets the mail
12 too. But back in those days I got the mail most of the
13 time. Our office is -- may I continue on?

14 Q Yes.

15 A My office is a situation where the mailman does
16 not come to the suites. He goes -- we have mailboxes. We
17 have to go to the mailbox and draw out the mail each day.

18 Q Okay.

19 A And normally I did that.

20 Q Did Norma ever get the mail?

21 A Occasionally.

22 Q Okay. I would like to explain to you because
23 there are so many Sumpters and Brashers in this. I use --
24 at the Judge's request, we all will be using people's first
25 names, and I don't mean any disrespect.

1 A None taken.

2 Q Okay. Okay, I would like you to turn to Exhibit
3 No. 1.

4 A One.

5 Q Do you recognize this document?

6 JUDGE STEINBERG: Let the witness look at it.

7 MR. KNOWLES-KELLETT: You're welcome to take time
8 to look through it.

9 JUDGE STEINBERG: If he wishes.

10 (Witness reviews document.Z)

11 THE WITNESS: Yes, sir. I would assume this is
12 the Net Wave petition. I'm not good on legal things, but
13 that's what I think it is.

14 BY MR. KNOWLES-KELLETT:

15 Q Okay, that's what you call it by?

16 A I called it the Net Wave petition.

17 Q Okay.

18 A Is that okay?

19 Q Would you call it the petition for order to show
20 cause?

21 A It says petition for order to show cause.

22 Q Okay. I think you may have referred to it at one
23 point as that, I don't know. Do you use both?

24 A It's the original thing that started the problem.

25 Q Okay. Could you -- so did you receive a copy of

1 this?

2 A Yes, I did.

3 Q How did you receive it?

4 A Through the mail.

5 Q Okay. At your office?

6 A At my office.

7 Q Okay. And what did you do when you received this?

8 A I immediately called Ronald Brasher.

9 Q And what discussions did you have?

10 A I said, "Ronald, what is this I got in the mail?

11 It looks legal. It's got my name on it. It's got my

12 children's name on it. It's got my wife's name on it. I

13 don't understand it." And he had not seen it at that point.

14 Q Okay. What happened then?

15 A He said, "Well, I don't know what it is. And I

16 tried to read some of it to him. And then -- he lived in

17 Mesquite or still lives in Mesquite or Sunnyvale, that's

18 close, and so he came by the office that afternoon to look

19 at it, to see what I was talking about. Came by my office

20 and set down and read it in my office.

21 Q Did you have any discussions at that time in your
22 office?

23 A Yes, I did. I said, "Ronald, I don't know what

24 this is. It's got my name on it. It's got a radio, it looks

25 like radio call sign or something. It's got my children's

1 name on it. We don't understand this. And in the late
2 eighties and nineties, early nineties, I know that you got
3 radio license in Norma, Melissa and Jennifer's name, but you
4 said those would have been immediately transferred out. And
5 I didn't know if that were those license and I was puzzled
6 about my name being on it.

7 Q What did he tell you in response to those
8 questions?

9 A "I'll take care of it. Don't worry about it.
10 I'll take care of it."

11 Q Did he tell you about any other underlying facts?

12 A Yeah, he said it was a competitor trying to give
13 him a hard time.

14 Q Okay.

15 A Trouble caused by a competitor.

16 Q Did he never talk to you about -- did he talk to
17 you at that time about applications made -- the application
18 in 35 that you said you didn't sign?

19 MR. MCVEIGH: Exhibit 35?

20 MR. KNOWLES-KELLETT: Exhibit 35.

21 THE WITNESS: Did he talk to me about that
22 application? No, sir.

23 MR. KNOWLES-KELLETT: Okay.

24 BY MR. KNOWLES-KELLETT:

25 Q So it was your understanding this still related to

1 something out of the early nineties, the applications --

2 A I really didn't know.

3 MR. ROMNEY: Objection; leading, Your Honor.

4 JUDGE STEINBERG: Sustained.

5 MR. KNOWLES-KELLETT: Okay.

6 BY MR. KNOWLES-KELLETT:

7 Q What licenses did you think this related to?

8 A I really didn't know when I saw it. I didn't know
9 what license. I didn't know about license, and I didn't
10 know what it related to. The only thing I could think of
11 was the license that I knew he got in their names back
12 several years before. That's all I could think of. But I
13 knew I never signed anything.

14 Q Okay. I would like you to turn to Exhibit 37,
15 page 14.

16 THE WITNESS: Are you all cold or is it just me?

17 JUDGE STEINBERG: No, everyone in the room is cold
18 except me because I've got this polyester dress on.

19 THE WITNESS: Okay. You don't have another one of
20 those?

21 (Laughter.)

22 JUDGE STEINBERG: The reporter, I think, has
23 got --

24 MS. LANCASTER: Your Honor, if I might interject.
25 I would be happy to go and get your jacket out of the

1 witness room?

2 THE WITNESS: Well, it's a top coat. That's okay.
3 I'll go on. That's fine.

4 JUDGE STEINBERG: If you are truly uncomfortable,
5 I've got gloves upstairs.

6 (Laughter.)

7 THE WITNESS: That will be alright.

8 Now, what page? I'm sorry.

9 MR. KNOWLES-KELLETT: Page 14.

10 JUDGE STEINBERG: What exhibit?

11 MR. KNOWLES-KELLETT: Exhibit 37.

12 JUDGE STEINBERG: Thank you.

13 THE WITNESS: Fourteen? Okay.

14 BY MR. KNOWLES-KELLETT:

15 Q This is Attachment B to your declaration. Do you
16 recognize that?

17 A I don't recognize it as Attachment B. I recognize
18 the --

19 Q Flip back one page, if you would please to page
20 13.

21 A Oh, okay. Yes, sir, I do.

22 Q I'm not trying to say anything by that. I'm just
23 trying to identify it for the record.

24 A Yes, sir.

25 Q Okay. Have you seen this document before?

1 A Yes, sir.

2 Q Okay. Could you explain how you came to see this
3 document?

4 A Ronald faxed it to me. I think his fax header is
5 on it. Soon after this, I'm not sure of the exact dates,
6 but soon after this he faxed this as a way to satisfy me or
7 relieve my anxiety --

8 MR. ROMNEY: Objection, Your Honor. Move to
9 strike this part of the testimony. It's nonresponsive to
10 the question that was asked of him.

11 JUDGE STEINBERG: The question was how did you
12 come to see it, and the answer was Ronald faxed it to him.

13 MR. ROMNEY: That's right.

14 JUDGE STEINBERG: And --

15 BY MR. KNOWLES-KELLETT:

16 Q Okay, do you know why he faxed it to you?

17 A He faxed it to me to relieve my anxiety about this
18 situation, that he was going to take care of it.

19 Q Okay, did you read it --

20 JUDGE STEINBERG: Okay, that was your
21 understanding as to why you got that?

22 THE WITNESS: Yes, sir.

23 JUDGE STEINBERG: Got this page?

24 THE WITNESS: This page right here; yes.

25 BY MR. KNOWLES-KELLETT:

1 Q Okay, I'd like to ask the same thing with respect
2 to the whole attachment, which is through page 19.

3 A Same --

4 MR. MCVEIGH: Are we talking about pages 14 to 19?

5 MR. KNOWLES-KELLETT: On Exhibit 37.

6 THE WITNESS: And your question was?

7 BY MR. KNOWLES-KELLETT:

8 Q Was all of this faxed to you?

9 A Yes, sir.

10 Q The reason it was faxed to you, was it all the
11 same reason?

12 A Yes, sir.

13 Q Okay. Did you ever have a -- did you ever speak
14 with Brown & Schwaninger?

15 A No, sir, I never did.

16 Q Did you ever authorize Brown & Schwaninger to
17 represent you?

18 A No, sir.

19 Q Do you see the first page, the second page, page
20 15?

21 A Yes, sir.

22 Q Do you see in the first paragraph where it
23 indicates that Jim Sumpter, Melissa Sumpter, Norma Sumpter
24 and Jennifer Hill, among others, by their attorneys hereby
25 file this opposition?

1 A I see our names on there.

2 Q Okay. Did you read that at the time you received
3 this?

4 A I'm sure I did.

5 Q Okay. Did it cause you any concern that they were
6 representing you, representing that they were representing
7 you?

8 A I didn't understand -- understand at that point
9 they represented me in anything, and my name was on there,
10 but my name was on the other paper too, our names, not my
11 name, our names were on both papers.

12 Q Did you have any discussions with Ron Brasher
13 regarding this document?

14 A No, sir.

15 Q Did you have any discussions with anybody at DLB
16 regarding this document?

17 A No, sir.

18 Q So did you authorize Brown & Schwaninger in any
19 way to represent you?

20 A Not at all.

21 Q Did you object in any way to their representation?

22 A No, sir.

23 MR. ROMNEY: I'm sorry. I didn't hear the answer
24 to the last question, Your Honor.

25 JUDGE STEINBERG: That answer was "No, sir."

1 MR. ROMNEY: That he did not object to Brown &
2 Schwaninger representing them?

3 THE WITNESS: No one asked me.

4 BY MR. KNOWLES-KELLETT:

5 Q Did you ever send them anything --

6 MR. ROMNEY: Objection; move to strike. Your
7 Honor, there was no question before the witness.

8 JUDGE STEINBERG: Okay. Go ahead.

9 BY MR. KNOWLES-KELLETT:

10 Q Did anyone ever ask you whether they should
11 represent you?

12 A I'm sorry?

13 Q Did anyone ever ask you whether they should
14 represent you?

15 A Whether Brown & Schwaninger --

16 Q Right.

17 A -- should represent me?

18 No.

19 Q Okay. Did you ever send them any written material
20 confirming that they represent you?

21 MR. MCVEIGH: Objection; vague. Who are "they"?

22 BY MR. KNOWLES-KELLETT:

23 Q Did you ever send Brown & Schwaninger anything
24 confirming that Brown & Schwaninger could represent you?

25 A Like an engagement letter? No.

1 Q Any type of letter.

2 A No.

3 Q Okay, I would like to turn your attention to
4 Exhibit 39. Is that your signature?

5 A Yes, sir.

6 Q Did you send this letter?

7 A Yes, I did.

8 Q Do you know if Ron Brasher received this letter?

9 A I don't know.

10 Q Are you the author of the words in this letter?

11 A Yes, sir.

12 Q Is this letter accurate, to the best of your
13 knowledge?

14 A I'm sure it is. Let me read it.

15 Q Please do.

16 (Witness review document.)

17 THE WITNESS: Yes, sir, it's accurate.

18 BY MR. KNOWLES-KELLETT:

19 Q I would like you to turn to page -- to Exhibit 40.

20 Excuse me. I would like you to turn to Exhibit 38.

21 Did you receive this letter with or without the
22 handwriting at your office?

23 A I received it without the handwriting.

24 Q At your office?

25 A Yes, sir.

1 Q Okay. Did it come in the mail?

2 A I don't know. I think Ronald brought it.

3 Q Okay. Whose handwriting is on it?

4 A It's mine.

5 Q Okay. How did you know what to fill in for the
6 blanks?

7 A He told me.

8 And could I add something to that?

9 Q Yes.

10 A It's covered in my letter of December the 20th,
11 whatever exhibit that is. I say in my letter of December
12 the 20th you told me the information, you provided me the
13 information.

14 Q Okay. And then you signed this letter?

15 A Yes, I did.

16 Q Okay. Did he tell you at that time that your
17 station was in fact constructed -- the station license to
18 you was in fact constructed?

19 A Yes, sir.

20 Q And that's how you came to represent to the FCC
21 that it was constructed?

22 A Yes, sir.

23 Q Okay. Exhibit 40? Is this the letter you were
24 referring to a minute ago?

25 A Yes, sir.

1 MR. ROMNEY: I'm sorry. I didn't hear the end of
2 your question.

3 BY MR. KNOWLES-KELLETT:

4 Q Is this the letter you were referring to a minute
5 ago?

6 A Yes, sir.

7 Q Did you author this letter?

8 A Yes, I did.

9 Q Did you sign this letter?

10 A Yes, I did.

11 Q Did you send it to Ron and Pat Brasher?

12 A Yes, sir, I did.

13 Q Do you know if they received this letter?

14 A I don't know.

15 Q Did you have -- with respect to both letters,
16 Exhibit 39 and Exhibit 40, did you have any discussions with
17 Ron and Pat Brasher about those matters in the November -
18 December period?

19 MR. MCVEIGH: Objection; vague.

20 MR. KNOWLES-KELLETT: '97 period.

21 MR. MCVEIGH: Could we clarify what those matters
22 are?

23 MR. KNOWLES-KELLETT: The matters covered in the
24 letter.

25 THE WITNESS: Yes, sir.

1 BY MR. KNOWLES-KELLETT:

2 Q Other than the 800A which you said Ron provided to
3 you when you filled it out.

4 A Yes, sir. We had ongoing discussions after we
5 received the petition to show cause from Net Wave.

6 Q Do you remember specifically what was discussed?

7 A Yes, sir. I would say, "What is this? Tell me
8 what this is. I don't understand it. I don't understand
9 what's going on."

10 And there was this reassurance that, "Don't worry,
11 it's just a little radio license. It doesn't really matter.
12 I'll take care of it. I'll take care of it. I'll take care
13 of it."

14 Q Who gave you those reassurances?

15 A Ronald.

16 Q Okay. If you would turn to Exhibit 40 at the
17 bottom, I think the next to the last -- the beginning of the
18 last paragraph, you asked that the license be transferred
19 from your name.

20 A Right.

21 Q Am I characterizing that sentence --

22 A Yes.

23 Q Did you have any discussion with Ronald about
24 that?

25 A Yes.

1 Q What did he say?

2 A I had discussions in the same way that the letter
3 says. I said, "Transfer it out of my name." And he said,
4 "I'll do it."

5 Q Okay, turning back to the second page of your
6 declaration, Exhibit 37.

7 A Page 2?

8 Q Page 2.

9 MR. MCVEIGH: Page 2 of the declaration or --

10 MR. KNOWLES-KELLETT: Page 2.

11 MR. MCVEIGH: -- page 2 of the exhibit?

12 JUDGE STEINBERG: Page 2 of the exhibit.

13 MR. KNOWLES-KELLETT: Page 2 of the exhibit which
14 is also page 2 of the declaration.

15 JUDGE STEINBERG: Well, we're going by the circled
16 numbers on the bottom.

17 MR. KNOWLES-KELLETT: Okay.

18 BY MR. KNOWLES-KELLETT:

19 Q I believe you state there towards the end of the
20 paragraph, "In those conversations, Ronald was adamant that
21 I had signed an application and he said that Net Wave was
22 just trying to cause a fuss and --

23 A I'm sorry. Which paragraph are you on?

24 First paragraph?

25 Q End of the first paragraph.

1 JUDGE STEINBERG: I can't read up side down. No,
2 I'm just trying to help you.

3 MR. MCVEIGH: Are you talking about the paragraph
4 fragment or the first complete paragraph?

5 MR. KNOWLES-KELLETT: The paragraph fragment.

6 JUDGE STEINBERG: Okay, I pointed --

7 MR. KNOWLES-KELLETT: The last four sentences.
8 You can read them to yourself.

9 JUDGE STEINBERG: I've pointed the witness to the
10 sentence beginning, "In those conversations..."

11 MR. KNOWLES-KELLETT: Could you read from there to
12 the end of the paragraph?

13 (Witness reviews document.Z)

14 THE WITNESS: Okay. Yes, sir, I've read.

15 MR. KNOWLES-KELLETT: Okay.

16 BY MR. KNOWLES-KELLETT:

17 Q I think it indicates in there, if I characterize
18 it correct, that he sort of convinced you that you had
19 signed an application?

20 A He did.

21 Q Okay. In Exhibit --

22 MR. ROMNEY: I'm sorry, Your Honor. I can't hear
23 the questions. I would ask the Court to instruct Mr.
24 Kellett to speak a little louder, please.

25 MR. KNOWLES-KELLETT: I will try to.